

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

**ELEANOR McCULLEN, JEAN  
BLACKBURN ZARRELLA,  
GREGORY A. SMITH, CARMEL  
FARRELL, and ERIC CADIN,**

Plaintiffs,

**v.**

**MARTHA COAKLEY, Attorney  
General for the COMMONWEALTH OF  
MASSACHUSETTS,**

Defendant.

**Civil Action No.** \_\_\_\_\_

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**MOTION TO ADMIT BENJAMIN W. BULL PRO HAC VICE**

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Philip D. Moran, a member in good standing of the Bar of this Court, hereby moves for the admission of Benjamin W. Bull to participate in the conduct of the trial of this action and related pre-trial and post-trial proceedings on behalf of Plaintiffs. In support of this motion, Mr. Bull states as follows:

1. I am a licensed attorney with thirty-two (32) years experience in federal civil rights and First Amendment litigation. My business address is Alliance Defense Fund; 15100 N. 90th Street; Scottsdale, Arizona 85260. My telephone number is (480) 444-0020. My email address is [bbull@telladf.com](mailto:bbull@telladf.com).

2. I am an active member in good standing of the State Bars of Arizona (Bar # 009940), District of Columbia (Bar # 388206), and Virginia (Bar # 15059). I am admitted to practice, and in good standing, in the United States District Courts for the District of Arizona, Northern District of California, and Eastern District of Virginia, as well as the United States Courts of Appeal for the Fourth, Fifth, Sixth, Eighth, Ninth, Eleventh, and District of Columbia

Circuits, and the United States Supreme Court.

3. I have never been subject to professional disciplinary proceedings, or criminal charges, of any kind, and my name does not appear on any list of attorneys disqualified to appear in the aforementioned courts or any other courts of record. There are no disciplinary proceedings currently pending against me.

4. I will familiarize myself with and comply with the standards of professional conduct required of members of the Massachusetts State Bar and the local rules of this Court.

5. Attached hereto is a true and correct copy of a Certificate of Good Standing from the United States District Court for the District of Arizona, dated January 7, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

/s/Benjamin W. Bull  
Benjamin W. Bull

WHEREFORE, movant hereby moves the court to admit Benjamin W. Bull *pro hac vice* to appear on behalf of Plaintiffs in this action.

#### **CERTIFICATION OF COMPLIANCE**

Pursuant to Local Rule 7.1(a)(2), the undersigned hereby certifies that on Monday, December 31, 2007, counsel for Plaintiffs conferred with Kenneth W. Salinger, Esq., Administrative Law Division, Office of the Attorney General, Commonwealth of Massachusetts, who stated that the Commonwealth does not oppose this motion.

Respectfully submitted,

/s/ Philip D. Moran  
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